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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

John Doe.

Case No. 2:21-cv-20706

Plaintiff,

v.

Baila Sebrow

Defendant

**NOTICE OF MOTION TO STRIKE DEFENDANT
BAILA SEBROW'S ANSWER**

PLEASE TAKE NOTICE that, the undersigned attorney for the plaintiff, JOHN DOE, will move before the United States District Court of the District of New Jersey, to strike defendant Baila Sebrow's answer pursuant to Rules 37(b)(2)(A)(iii) and 37(c), to enter a default judgment against defendant, awarding attorney fees and to set this matter down for an inquest.

In support of this motion, the Plaintiff will submit the Declaration of Daniel S. Szalkiewicz, Esq and Brief in Support. A proposed Order is also submitted herewith pursuant to Local Rule 7.1(e).

Dated: July 28, 2025
New York, New York

Respectfully submitted,

By: /s/Daniel Szalkiewicz
Daniel S. Szalkiewicz, Esq. (DS2323)